

Mr. Timothy A. Frazier
U.S. Department of Energy
Document Manager
NE-50/GTN Building
Office of Nuclear Energy Science and Technology
1000 Independence Ave, S.W.
Washington, DC 20585-1290

Dear Mr. Frazier:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the Environmental Protection Agency (EPA) has reviewed the Proposed Consolidation of Nuclear Operations Related to Production of Radioisotope Power Systems Draft Environmental Impact Statement (DEIS) (CEQ# 20050266).

Under the Atomic Energy Act of 1954, the Department of Energy's (DOE) mission includes meeting the nuclear material needs of other Federal agencies. In order to meet this mission, DOE has supplied radioisotope power systems (RPSs) for National Aeronautics and Space Administration and national security missions for the past four decades. The infrastructure required to produce RPSs is currently located at three geographically separated and distant DOE sites: Idaho National Laboratory, Idaho; Los Alamos National Laboratory, New Mexico; and Oak Ridge National Laboratory, Tennessee. After the events of September 11, 2001, DOE re-evaluated security requirements for the storage and transport of special nuclear materials (i.e., plutonium-238) and other radioactive materials. It determined that consolidating plutonium-238 nuclear production operations at a single, highly-secure site would better protect these materials, eliminate the need for interstate transportation, and avoid the cost of implementing security upgrades at multiple sites. In this DEIS, DOE proposes to consolidate production of plutonium 238 along with related operations including storage of Neptunium 237 (which is required for plutonium-238 production) at the Idaho National Laboratory.

EPA commends the efforts of DOE in the preparation of this comprehensive and well-organized document. We would like to highlight the well-placed use of incorporation by reference of extensive environmental analyses that already exist for many of the existing and recent site-wide or programmatic EISs. Based on our review of the DEIS, we have rated the document as LO-Lack of Objections.

We appreciate the opportunity to review this DEIS. We also look forward to reviewing the FEIS related to this project. The staff contact for the review is Marthea Rountree and she can be reached at (202) 564-7141.

Sincerely,

Norton Miller

Director

of Federal Activities

Anne

Office